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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
Performance Measurements and)
Reporting Requirements)
for Operations Support Systems,)
Interconnection, and Operator Services)
and Directory Assistance)

CC Docket No. 98-56
RM-9101

COMMENTS OF ALLEGIANCE TELECOM, INC.

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Summary

Allegiance generally supports the Commission's proposal to adopt performance measurements and reporting requirements in order to assist the industry and state regulators in monitoring the performance of ILECs in their provision of service to their competitors. The ability to monitor and measure an ILEC's performance in provisioning service to CLECs such as Allegiance is integral to the CLEC's ability to serve its customers and to ensure that the ILEC is providing services to the CLEC on nondiscriminatory terms. Moreover, if designed correctly, performance measurements and reports will enable CLECs and regulators to predict and prevent discriminatory conduct by ILECs before it occurs.

Allegiance also makes the following recommendations with respect to specific proposals set forth in the Notice:

- Statistical tests should be used in combination with performance benchmarks or standards to detect instances of discrimination.
- ILECs should make monthly performance reports.
- ILEC reports should include a customer category for the ILEC's ten largest retail customers. Reports for the customer categories of all retail customers and CLECs in the aggregate should be made publicly available.
- Regulators should retain the right to audit ILEC reports and examine the underlying raw data; CLECs should be given the same rights, subject to reasonable restrictions.
- ILECs should be required to report separately the denials of collocation requests where such denials are based on space considerations.
- ILECs should be required to break down reports on the ordering and provisioning of unbundled loops into at least four loop categories.
- ILECs should be required to report separately ordering and provisioning data for tandem interconnection trunks and end office interconnection trunks to assist regulators and the industry monitor tandem exhaustion.
- ILEC reports should be based on a geographic level no larger than the Metropolitan Statistical Area.

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Introduction

Allegiance Telecom, Inc. ("Allegiance") hereby files its Comments, pursuant to the Notice of Proposed Rulemaking ("Notice") issued in the above-captioned docket, on the model performance measurements and reporting requirements proposed by the Federal Communications Commission ("Commission") for operations support systems ("OSS"), interconnection, and operator services and directory assistance.

Allegiance is a competitive local exchange carrier ("CLEC") that purchases interconnection, unbundled network elements and wholesale services from incumbent local exchange carriers ("ILECs"). Allegiance therefore has a direct interest in the adoption of performance measurements and reporting requirements for ILECs' provision of service to CLECs. As set forth in greater detail below, Allegiance generally supports the Commission's proposal to adopt performance measurements and reporting requirements in order to assist the industry and state regulators in monitoring the performance of ILECs in their provision of service to their competitors. The ability to monitor and measure an ILEC's performance in provisioning service to CLECs such as Allegiance is integral to the CLEC's ability to serve its customers and to ensure that the ILEC is providing services to the CLEC on nondiscriminatory terms. Moreover, if designed correctly, performance measurements and reports will enable CLECs and regulators to predict and prevent discriminatory conduct by ILECs before it occurs.

I. Providing CLECs and Regulators with Access to Information Is Essential to Ensure ILECs' Compliance with Their Nondiscrimination Duties

Although the Telecommunications Act of 1996 ("1996 Act") is over two years old, new entrants have yet to carve out a significant share of the nation's local exchange market. One of

the reasons is that it takes more than an interconnection agreement with an ILEC to compete in the local exchange market. Among other things, new entrants like Allegiance have an essential need for access to timely, accurate, and effective operations support systems to make customer orders, provision service, write trouble tickets, and bill customers. The ILECs, who still control the bottleneck local exchange facilities necessary to reach most customers, also control the systems necessary to service CLECs' customers. For example, if the ILEC has quicker and more reliable access to information regarding the availability of new telephone numbers or the existence of available lines to a new customer's neighborhood, Allegiance may not be able to provision service to a new customer in the same time frame in which the ILEC can provide the same customer with service. While Allegiance's service delay may be caused entirely by substandard access to the ILEC's OSS, the customer will most likely fault Allegiance, not the ILEC, for the delay in establishing service, and Allegiance may subsequently suffer financially as customers who encounter such delays return to the ILEC.

Although ILECs have a duty under the Communications Act of 1934, as amended ("Act"), and the Commission's rules to provide their competitors with nondiscriminatory interconnection and access to the ILECs' OSS, operator services and directory assistance,¹ without performance measurements and reports, CLECs and regulators have no means by which to measure ILECs' satisfaction of, or failure to satisfy, their nondiscrimination duties. The fact that ILECs have a

¹ See, e.g., *Implementation of the Local Competition Provisions in the Telecommunications Act of 1996*, CC Docket No. 96-98, First Report and Order, 11 FCC Rcd 15499, ¶ 517 (1996) ("Local Competition Order").

stranglehold on essential inputs needed by most competitive carriers to ply their trade (in particular, the bottleneck monopoly represented by the embedded infrastructure of local loops), and are competing at retail against their wholesale customers, creates a material conflict of interest. It is both necessary and appropriate that monopolists in control of both essential facilities and essential information be required to share information with their competitors and regulators where such information is relevant to the satisfaction of their nondiscrimination duties.

Under the Commission's rules, competing carriers must be able "to perform the functions of pre-ordering, ordering, provisioning, maintenance and repair, and billing for network elements and resale services in substantially the same time and manner that an incumbent can for itself."² Furthermore, ILECs must provide competitors with "equivalent access to OSS functions that an incumbent uses for its own internal purposes or offers to its customers or other carriers."³ In its Notice, the Commission defines nondiscriminatory access to OSS functions as a straightforward concept: "efficient and effective communication between the retail service provider (*i.e.*, the new competitor) and the wholesale provider (*i.e.*, the incumbent carrier)."⁴ While this definition represents a first step toward delineating ILECs' OSS duties, it does not go nearly far enough. The Commission must make clear that nondiscriminatory access to OSS includes the obligation

² Local Competition Order at ¶ 518.

³ *Implementation of the Local Competition Provisions in the Telecommunications Act of 1996*, CC Docket No. 96-98, Second Order on Reconsideration, 11 FCC Rcd 19738, ¶ 9 (1996).

⁴ Notice at ¶ 9.

to provide information regarding the ILEC's level of performance. Unless the Commission's definition of nondiscriminatory access includes access to information regarding the level of service the ILEC is actually providing to its competitors vis-a-vis to itself, affiliates, or other retail or wholesale customers, the test will be hollow and easily met by ILECs with little to no incentive to provide service at parity to their competitors.

As the Commission notes, uniform performance measurements and reports "should bring benefits to both new entrants and incumbents by establishing an objective manner through which an incumbent's compliance with its statutory obligations can be observed on a regular basis."⁵ In developing performance measurements and reports, Allegiance urges the Commission to take into consideration a further goal and purpose – performance measurements and reports can provide a valuable tool for detecting early evidence of discriminatory conduct or even predicting and preventing discriminatory conduct before it occurs. This further goal is entirely consistent with the intent of Congress to open up the local exchange markets to competition and to allow the market for such services to be shaped by market forces, rather than government intervention.

II. The Commission Has Jurisdiction to Issue the Proposed Model Performance Measurements and Reports As Rules

The Commission notes that it intends to adopt "model," as opposed to legally binding, performance measurements and reports that can be used by industry participants and state regulators. Notwithstanding its tentative conclusion to adopt only model rules, the Commission

⁵ Notice at ¶ 5.

requests comment on whether or not it has jurisdiction to adopt legally binding rules rather than merely model rules. As shown below, the Act clearly does give the Commission jurisdiction to adopt performance measurements and reports with respect to interconnection and the unbundled network elements of OSS, operator services and directory assistance.

The Commission properly exercised its authority under the Act in determining that ILECs must provide CLECs access to the ILEC's OSS, operator services and directory assistance on an unbundled basis. *Iowa Utils. Bd. v. FCC*, 120 F.3d 753, 808-9 (8th Cir. 1997), *cert. granted*, *AT&T Corp. v. Iowa Utils. Bd.*, 118 S.Ct. 879 (Jan. 26, 1998). The Commission has the authority to adopt regulations regarding the unbundled network elements of OSS, operator services and directory assistance, including performance measurements and reports, under Section 251(d)(2). *Iowa Utils. Bd.*, 120 F.3d at 794 n.10. The Commission also has the authority to adopt standards to ensure that ILECs provide interconnection on a nondiscriminatory basis to requesting carriers. *Iowa Utils. Bd.*, 120 F.3d at 813 n.33 (upholding Commission's statement that "the obligations imposed by sections 251(c)(2) and 251(c)(3) include modifications to incumbent LEC facilities to the extent necessary to accommodate interconnection or access to network elements").

While the Commission has ample authority under these Sections to adopt the proposed model rules as binding rules, it also has independent rulemaking authority under sections 4(i), 201(b) and 303(r) of the Act to implement the provisions of the Communications Act. Rules adopting performance measurements and reports for unbundled network elements and services would implement the local competition provisions of Sections 251 and 252 of the Act -- and

specifically the provision of Section 251(c)(3) to provide "nondiscriminatory access to network elements" to any requesting carrier and the provision of Section 251(c)(2)(C) to provide interconnection to any requesting carrier that is "at least equal in quality" to the interconnection the ILEC provides itself, its affiliates or any other party. Accordingly, such rulemaking is well within the Commission's statutory authority.

The performance measurements and reports proposed in the Notice are "necessary in the public interest to carry out the provisions of this Act" (Section 201(b)), because they are needed to make it possible for all parties and the Commission to determine readily, without lengthy and burdensome case-by-case litigation, whether the OSS provided by an ILEC to a competitive carrier complies with the nondiscrimination mandate of section 251(c)(3) of the Act. For the same reason, they are "necessary to carry out the provisions of this Act" (Section 303(r)). Without clear standards to determine whether the ILECs are providing OSS on a nondiscriminatory basis, the ILECs have every incentive to continue to provide OSS at a discriminatory and unsatisfactory level to their competitors. The Act does not guarantee that competitors will win market share at the expense of ILECs, but it does guarantee competitors a fair opportunity to compete for customers without the mistake-filled and delay-prone OSS service provided by ILECs that guarantees CLEC customer dissatisfaction.

Finally, the proposed performance measurements and reports are "necessary in the execution of [the Commission's] functions" (Section 4(i)). One of the "functions" of the Commission is to take enforcement action against violations of the Act, under either the complaint

procedure of Section 208 or the cease-and-desist procedure of Section 312(b). Regulations that permit the Commission and competitors to measure the ILECs' provision of OSS to competitors are "necessary in the execution of [the Commission's enforcement] functions," because they would relieve the Commission and the parties from the burden of addressing discrimination on a case-by-case basis.

Allegiance urges the Commission to exercise its jurisdiction and adopt performance measurements and reports. Such action will not preclude state commissions from adopting their own measurements and reports, as they clearly may adopt regulations regarding interconnection that are not inconsistent with the Act and do not prevent implementation of the Act. 47 U.S.C. § 251(d)(3). In order to preserve further federal-state comity, the Commission could adopt federal rules that apply only where state rules do not exist or where state rules fail to comply with the Act. The establishment of such rules by the Commission would likely have the effect of serving as guidance to states that would otherwise not adopt such rules independently.

III. Statistical Analyses and Customer Report Categories

A. Statistical Tests Should Be Used in Combination with Performance Benchmarks Or Standards to Detect Instances of Discrimination

Allegiance agrees that statistical analysis is an essential tool in determining whether or not an ILEC is meeting its obligation to provide competing carriers with nondiscriminatory interconnection and access to OSS, operator services and directory assistance. Allegiance does not object to having the ILEC perform the statistical analysis so long as competing carriers and regulators have (1) the right to audit the ILECs' statistical analysis and (2) the right to perform

the statistical analysis themselves with respect to the level of performance the ILEC provides to the CLEC. In this regard, it is imperative that ILECs make available to auditors, both regulators and CLECs, the underlying data on computer file as opposed to in paper format. As the FCC recognizes, provision of data in a computer file will permit CLECs and regulators to verify ILEC analysis by performing the tests themselves. Computer file format will also reduce the potential for error associated with the data entry necessitated by paper format.

Allegiance also agrees that a uniform statistical test would greatly facilitate comparison of ILEC performance across regions and provide regulators and competing carriers with valuable information that could be used to justify uniform performance standards.⁶ Allegiance understands that in order to be statistically valid, some of the statistical techniques under consideration require a minimum sample size of approximately 30 observations to be reliable. While this need for statistical reliability is important, it should not override the need for timely and frequent performance reports. Allegiance believes that for most of the customer reporting categories (*i.e.*, retail customers, CLECs in the aggregate, and ten largest retail customers (as proposed below)), the minimum sample size will be achieved within a one month period. However, Allegiance realizes that it is entirely possible that the reports with respect to specific CLECs will not meet

⁶ Allegiance does not agree with the Commission's tentative determination that it does not have enough evidence at this time to establish performance standards ILECs must meet to show compliance with their statutory duties. However, given the Commission's tentative conclusion not to adopt such standards, the Commission is correct that uniform performance reports and uniform statistical tests could provide valuable evidence that such standards are both necessary and appropriate.

the minimum 30 observations within a one-month period. Nevertheless, Allegiance urges the Commission to adopt a monthly reporting cycle. Allegiance believes that the ILECs already collect most of the underlying information on a monthly basis so that a monthly reporting cycle would not be unduly burdensome or costly to them.⁷ Because monthly reporting will allow for earlier detection of discrimination and could possibly expose disturbing trends in an ILEC's performance before it reaches the level of discrimination, Allegiance believes that the benefits of monthly reporting outweigh any burdens associated with monthly reporting. Furthermore, the problem of statistical validity based on sample size can easily be solved by performing the statistical tests on a quarterly basis for the evaluation of an individual CLEC's report that does not meet the minimum number of observations in any given month.

Allegiance does not agree with the Commission's proposal to use statistical tests alone to establish safe harbors for ILEC performance. In the absence of defined performance standards or benchmarks, a safe harbor based solely on statistical tests runs the risk of rewarding ILECs for degrading service to their own customers and providing unacceptably poor, albeit nondiscriminatory, levels of interconnection and access to OSS, operator services and directory assistance to its competitors.

⁷ Included as Attachment A to these comments is an example of some of the data Bell Atlantic already compiles with respect to its provision of service to CLECs. This information was presented by Bell Atlantic personnel at its Telecom Industry Services 1998 Spring Conference, held in Washington, D.C. May 27-29, 1998. It is reasonable to expect that this example represents a high level summary of the underlying data that would be required for the more detailed reports address herein. Further, it is reasonable to expect that each ILEC has ready access to comparable data.

Moreover, the Commission must be careful to adopt statistically valid tests that accurately measure ILECs' performance in accordance with their statutory duties. ILECs must not be permitted to discriminate in favor of their own customers, their affiliates, or large retail customers. As such, the Commission's suggestion that "statistical analysis can help reveal the likelihood that reported differences in a LEC's performance toward its *retail customers* and competitive carriers are due to underlying differences in behavior rather than random chance,"⁸ does not go far enough. An ILEC's performance toward competitive carriers must be compared against *all* categories for which data are collected. ILECs must provide CLECs service at parity with the service provided to themselves, their affiliates and to other requesting carriers. *See, e.g.*, Section 251(c)(2)(C). Limiting the statistical tests to a comparison of the ILEC's provision of service to a CLEC with the ILEC's provision of service to its retail customers would not meet the standards of the Act and would leave a gaping hole in the enforcement net that such measurements and tests are designed to create.

B. ILEC Reports Should Include a Category for the Ten Largest Retail Customers and the Aggregate Data Should Be Made Publicly Available

The Commission has proposed that ILECs provide separate reports for the following categories: (1) the ILEC's own retail customers; (2) any ILEC affiliates that provide local exchange service; (3) competing carriers in the aggregate; and (4) individual competing carriers. While all these categories are important and appropriate, the Commission has left out one

⁸ Notice at Appendix B, ¶ 1 (emphasis added).

important group of ILEC customers – an ILEC's ten largest retail customers. Indeed, some ILECs have already agreed, in negotiated or arbitrated interconnection agreements, to provide information regarding their level of service to this fifth category of customers.⁹ Like CLECs, such customers most likely purchase large volumes of a particular telecommunications service or functionality from the ILEC. Thus it is entirely appropriate, and most likely more valuable, to compare the ILECs' provision of service to CLECs with the ILECs' provision of service to this group of retail customers (as opposed to all retail customers generally).

It is also imperative that ILECs provide the public with access to aggregate-level reports for specific categories. Although Allegiance agrees with the Commission that information regarding an ILEC's level of performance to a specific customer must be strictly limited to protect confidential competitive and market information, there is no reason to limit public access to reports regarding the ILEC's provision of service to the ILEC's own retail customers and to competing carriers in the aggregate. As the Commission is well aware, public interest and consumer groups perform many functions that are in the public interest, including, but not limited to, providing consumers with greater access to information and acting as an independent watchdog monitoring industry practices. Since the passage of the 1996 Act, non-governmental groups have

⁹ See, e.g., Bell Atlantic Interconnection Agreement with AT&T for the State of New Jersey, Attachment 12.

produced such valuable information as reports evaluating RBOCs' compliance with their Section 271 obligations.¹⁰

With respect to audits of ILEC reports and access to the raw data underlying the reports, Allegiance agrees that competing carriers should be afforded the opportunity to audit the ILEC report regarding the service provided to the individual CLEC and have access to the raw data underlying the CLEC-specific report (Allegiance recommends computer file format). Furthermore, both state and federal regulators should have audit authority, and access to raw data, with respect to all customer categories of ILEC performance reports. Finally, Allegiance recommends that the Commission establish guidelines, including confidentiality standards, that would permit CLECs to audit all customer categories of ILEC reports in the context of proceedings before the Commission or a state regulatory agency to determine an ILEC's satisfaction of its duty to provide nondiscriminatory interconnection and access to OSS, operator services, and directory assistance to that CLEC.

IV. Certain Aspects of the Proposed Performance Measurements Need to Be Strengthened

A. Collocation

The Commission has proposed to require ILECs to report the following measurements on collocation: (1) average time to respond to a collocation request; (2) average time to provide a

¹⁰ See, "Study Finds Zero Compliance with 'Competitive Checklist,'" *Telecommunications Reports* (April 27, 1998) (referencing a study entitled "Making the Grade" by the Americans for Competitive Telecommunications, a coalition of consumer groups and other telephone customers).

collocation arrangement; and (3) percentage of due dates missed with respect to the provision of collocation arrangements. While these measurements are valuable, they do not go nearly far enough to detect potential instances of discriminatory conduct. Perhaps the most frequent and frustrating roadblock experienced by CLECs with respect to collocation is an ILEC's denial of collocation, both physical and virtual, based on physical space restrictions or space exhaustion. CLECs often must undergo a time consuming and confrontational process to verify the ILEC's denial of collocation based on space considerations.

In one of the first proceedings focused on collocation discrimination by an ILEC, an Administrative Law Judge at the Washington Utilities and Transportation Commission found that:

After receiving a request for collocation, it is reasonable to require USWC to file a report with the Commission stating whether vacant space is available, whether vacant space is required for growth needs, and whether sufficient aisle and buffer space exists to accommodate the request...¹¹

In addition, the Washington Collocation Order requires US West to "complete an inventory of inactive and underutilized equipment and assessment of vacant space" for three central offices in the State of Washington where CLECs had collocation requests rejected due to space limitations. Because this problem is directly related to individual central offices, Allegiance recommends that ILECs be required to report, within any given reporting period (Allegiance proposes one-month periods), the number of central offices for which physical collocation requests were denied on the

¹¹ *MFS Communications Company, Inc. Petition for Arbitration pursuant to 47 U.S.C. § 252(b) of the Interconnection Rates, Terms and Conditions with U S West Communications, Inc.*, Docket No. UT-960323, Initial Order on U S West Request for Exception from Duty to Provide Physical Collocation, 24 (WUTC, Dec. 23, 1997) ("Washington Collocation Order").

basis of space unavailability and the number of central offices for which virtual collocation requests were denied on the same basis. That reported information, combined with inventory information like that addressed by the Washington Commission, would provide a valuable tool for enforcing the Commission's rules and ILECs' nondiscrimination obligations.

B. Ordering and Provisioning

The Commission has proposed that an ILEC's reports be broken down into the following categories for the purposes of measuring the ILEC's provisioning performance: (1) resold services; (2) unbundled network elements ("UNEs"); and (3) interconnection trunks. Each of these categories, including UNEs, is necessarily broken down into additional subcategories. Allegiance strongly believes that the UNE of unbundled loops must be broken down even further if this measurement is to provide any meaningful evidence of ILEC discrimination, and that similarly detailed breakdowns are necessary for other UNEs.

Allegiance recommends that the UNE category of unbundled loops be further separated into the following categories: (1) 2-wire copper loops; (2) 2-wire mixed loops (copper plus fiber); (3) ISDN loops; and (4) xDSL compatible loops. These divisions are especially necessary given the RBOCs' Section 706 petitions which generally request that the Commission permit certain RBOCs to provide advanced services across LATA boundaries with little to no regulatory oversight. Without such separation, there is a distinct risk that discrimination in the provision of loops for advanced services could go undetected (presuming that the ILEC fills many more orders for traditional 2-wire copper loops than it fills for advanced loop types).

Allegiance also supports the Commission's proposal to track ILEC performance in ordering and provisioning interconnection trunks separately. Allegiance recommends that this category also be broken down into subcategories, specifically tandem interconnection and end office interconnection. Due to tandem exhaustion, competing carriers in some areas have been forced to undertake the expensive process of ordering interconnection trunks to multiple end offices where the level of traffic does not justify their provisioning of such trunks. As the ILECs themselves admit, tandem exhaustion is already a serious problem in many metropolitan areas. Requiring ILECs to report separately orders for tandem interconnection trunks, along with tandem jeopardies, would provide CLECs and regulators with valuable information to monitor the problem of tandem exhaustion.

C. Geographic Level of Reporting


The Commission has requested comment on what geographic level the ILEC reports should be based. Allegiance strongly recommends that ILEC reports be based on a geographic level no larger than the Metropolitan Statistical Area ("MSA"), or, where a MSA traverses multiple states, the MSA area within each of the states that the MSA traverses. In Allegiance's experience, the level of ILEC performance is highly dependent on the group of implementers, technicians, etc. assigned to a particular locality or central office. While the ILECs generally form teams that cover more than one locality or central office, their implementation teams typically do not cover an area greater than an MSA. Because an ILEC's performance can vary greatly not only within its region, but also within different areas in each state, it is imperative that the level of reporting

be small enough to permit detection of discriminatory conduct on a local basis. Thus if the FCC determines that reporting on a geographic level smaller than the MSA is feasible, Allegiance recommends that such smaller areas be adopted.

Conclusion

For the foregoing reasons, Allegiance urges the Commission to adopt performance measurements and reports, provide CLECs and the public with meaningful access to the reports, and establish statistically valid methods of evaluating the reports to ensure that ILECs meet their statutory obligation to provide CLECs with nondiscriminatory interconnection and access to operation support systems, operator services, and directory assistance.

Respectfully submitted,
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June 1, 1998

CERTIFICATE OF SERVICE

I, Robert McCausland, do hereby certify that the foregoing Comments of Allegiance Telecom, Inc., were served on the following this 1st day of June, 1998, via hand delivery:

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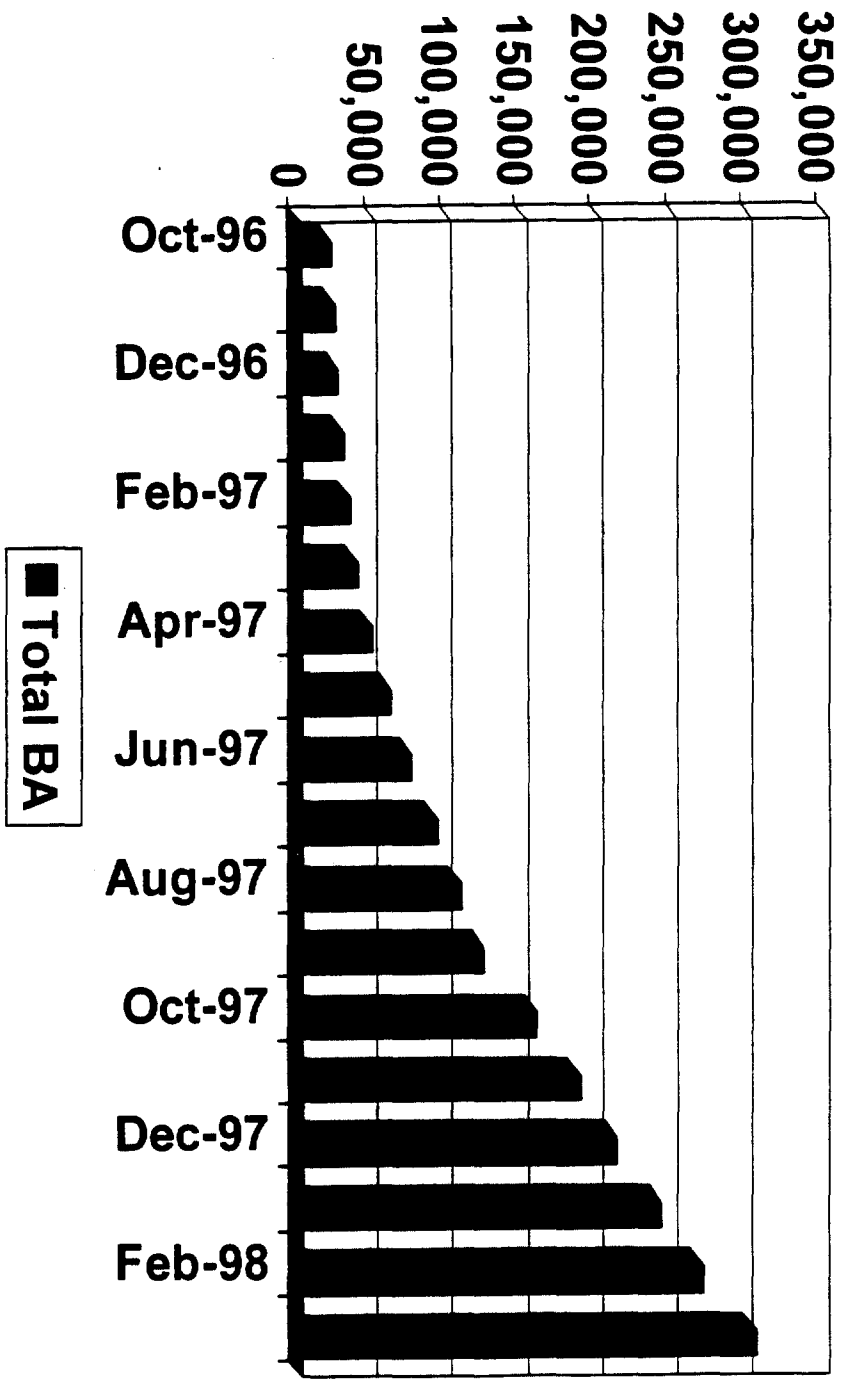
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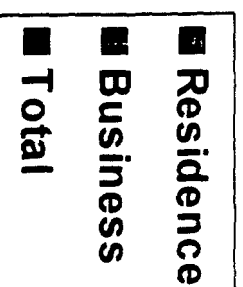
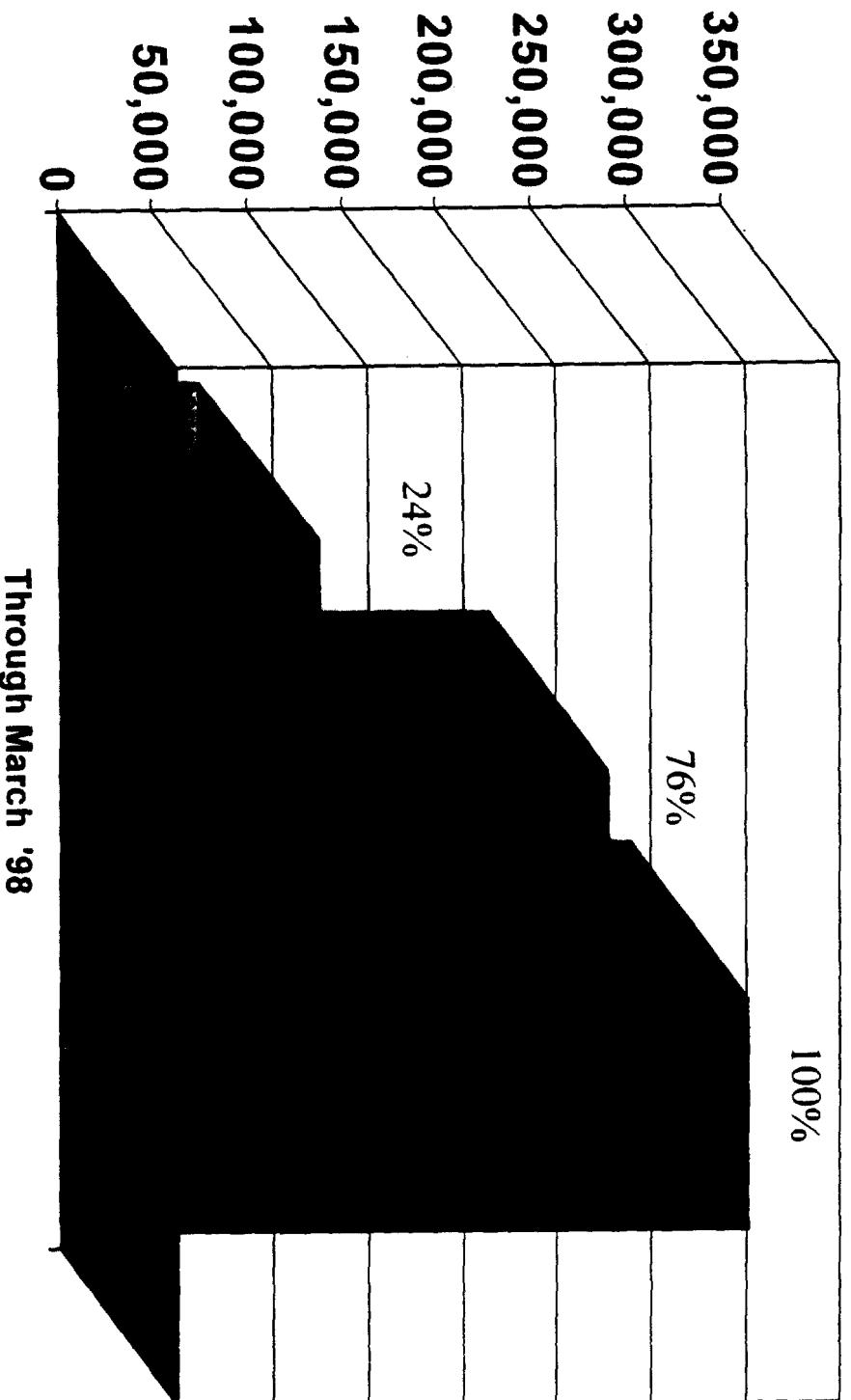
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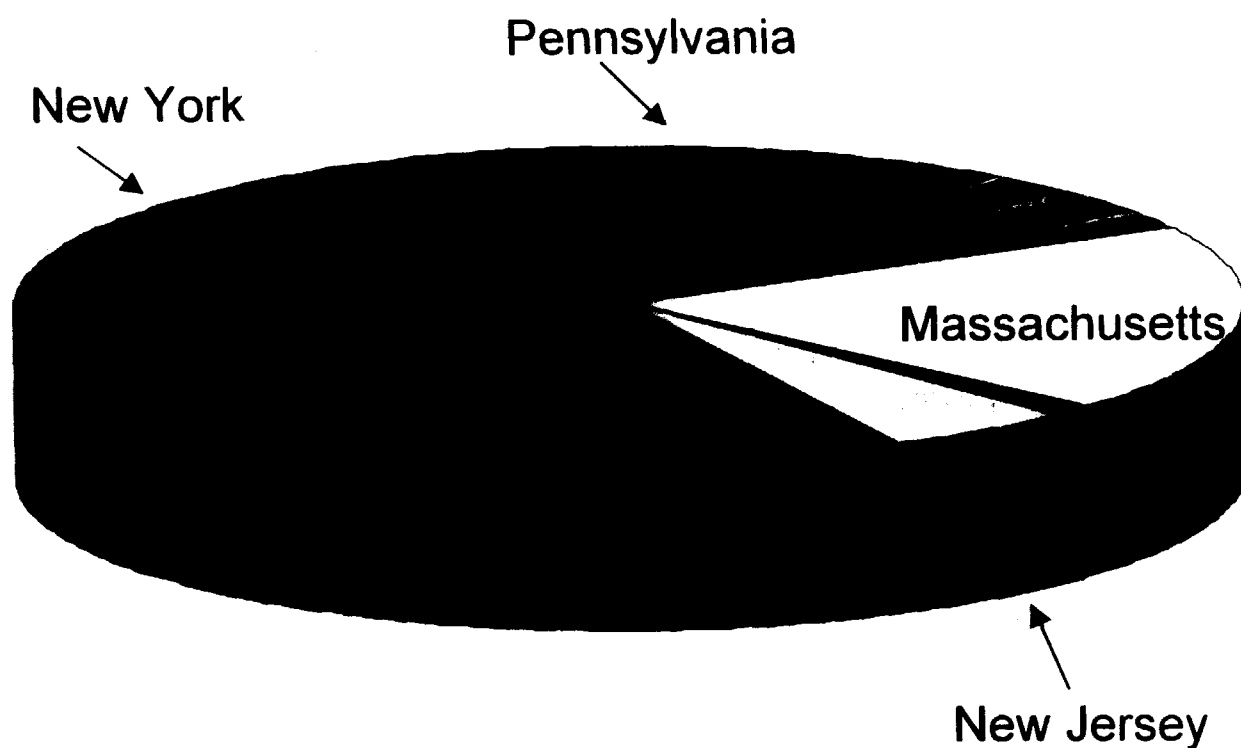
Resale Lines in Service



Resale Lines in Service



Resale Lines in Service by State



Total Bell Atlantic Resold Lines in Service through March 1998